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*Counsel for Plaintiffs Vinod Sodha and Amee Sodha  
and the Proposed Class*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

PHILIP GOLUBOWSKI, INDIVIDUALLY  
AND ON BEHALF OF ALL OTHERS  
SIMILARLY SITUATED,

**Plaintiff,**

V

## ROBINHOOD MARKETS, INC., ET AL.,

### Defendants.

CASE NO. 3:21-CV-09767-EMC

**SECOND STIPULATION RE FIRST  
AMENDED COMPLAINT &  
MOTION TO DISMISS BRIEFING  
AND [PROPOSED] ORDER**

1 Plaintiffs Vinod Sodha and Amee Sodha (the “Sodhas” or “Lead Plaintiffs”) and Defendants  
 2 Robinhood Markets, Inc. (“Robinhood”); Vladimir Tenev, Jason Warnick, Baiju Bhatt, Jan Hammer,  
 3 Paula Loop, Jonathan Rubinstein, Scott Sandell, Robert Zoellick (together with Robinhood, the  
 4 “Robinhood Defendants”); and Goldman Sachs & Co. LLC, J.P. Morgan Securities LLC, Barclays Capital  
 5 Inc., Wells Fargo Securities, LLC, Mizuho Securities USA LLC, JMP Securities LLC, KeyBanc Capital  
 6 Markets Inc., Piper Sandler & Co., Rosenblatt Securities Inc., BMO Capital Markets Corp., BTIG, LLC,  
 7 Santander Investment Securities Inc., Academy Securities, Inc., Loop Capital Markets LLC, Samuel A.  
 8 Ramirez & Company, Inc., and Siebert Williams Shank & Co., LLC (the “Underwriter Defendants,”  
 9 together with the Robinhood Defendants, the “Defendants,” and together with Lead Plaintiffs, the  
 10 “Parties”) by and through their counsel of record jointly stipulate as follows:

11 WHEREAS, on April 19, 2022, the Parties filed a stipulation setting forth a schedule for the filing  
 12 of Lead Plaintiffs’ amended complaint (the “Amended Complaint”), as well as briefing on Defendants  
 13 anticipated motions to dismiss (the “Scheduling Stipulation”).

14 WHEREAS, the Scheduling Stipulation provides that: (1) Lead Plaintiffs’ deadline to file the  
 15 Amended Complaint will be no later than June 10, 2022; (2) any motions to dismiss the Amended  
 16 Complaint filed by Defendants will be filed no later than August 8, 2022; (3) should a motion to dismiss  
 17 the Amended Complaint be filed, Lead Plaintiffs will file their opposition no later than October 7, 2022;  
 18 and (4) the moving party(s) will file its/their reply in further support of any motion to dismiss no later than  
 19 November 7, 2022;

20 WHEREAS, the Parties have conferred and agreed to a brief modification of the deadline for Lead  
 21 Plaintiffs to file the Amended Complaint, from June 10, 2022 to June 20, 2022, and for Defendants to file  
 22 any motions to dismiss the Amended Complaint, from August 8, 2022 to August 18, 2022;

23 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED THAT:

- 24 1. The deadline for Lead Plaintiffs to file their Amended Complaint is hereby modified from  
     June 10, 2022 to June 20, 2022.
- 25 2. The deadline for Defendants to move to dismiss the Amended Complaint is hereby  
     modified from August 8, 2022 to August 18, 2022.

- 1       3. All other dates and terms previously agreed to by the Parties as listed in the Scheduling  
2       Stipulation remain. Should a motion to dismiss be filed, Lead Plaintiffs' opposition will  
3       be due no later than October 7, 2022 and the moving party(s) will file its/their reply on or  
4       before November 7, 2022.  
5       4. Nothing in this stipulation prevents any party from seeking further extensions with the  
6       consent of the other parties or from the Court.

7 DATED: June 2, 2022

Respectfully submitted,

8                     JOHN T. JASNOCH  
9                     HAL CUNNINGHAM  
10                   **SCOTT+SCOTT ATTORNEYS AT LAW LLP**  
11                   /s/ John T. Jasnoch  
12                   JOHN T. JASNOCH

13                   Attorneys for Plaintiffs Vinod Sodha and Amee  
14                   Sodha

15                   ANTONY L. RYAN  
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19                   MARK R. CONRAD  
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22                   /s/ Mark R. Conrad  
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24                   Attorneys for Robinhood Defendants

25                   JAMES N. KRAMER  
26                   ALEXANDER K. TALARIDES  
27                   **ORRICK HERRINGTON & SUTCLIFFE LLP**

28                   /s/ Alexander K. Talarides  
29                   ALEXANDER K. TALARIDES

30                   Attorneys for Underwriter Defendants

**ATTESTATION (CIVIL LOCAL RULE 5-1(i)(3))**

In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from the signatories.

Dated: June 2, 2022

s/ John T. Jasnoch  
JOHN T. JASNOCH

## [PROPOSED] ORDER

Pursuant to stipulation, the Court resets the following deadlines and schedule:

1. Lead Plaintiffs shall file their First Amended Complaint no later than June 20, 2022;
  2. Defendants shall file any motions to dismiss no later than August 18, 2022;
  3. All other dates and terms previously agreed to by the Parties as listed in the Scheduling Stipulation filed April 19, 2022 remain.

## **IT IS SO ORDERED.**

Dated: June \_\_, 2022

**HONORABLE JUDGE EDWARD M. CHEN  
UNITED STATES DISTRICT JUDGE**